

1 *Law Offices of*
2 **Norman L. Schafler**
3 Bar #67425
4 12304 Santa Monica Blvd., Suite 300
5 Los Angeles, California 90025
6 (310) 207-6700
7 Attorney for Plaintiff

FILED

JAN - 6 2006

CLERK, U.S. DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
BY  DEPUTY CLERK

8 UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA

11 UNITED STATES OF AMERICA.,.)
12 Plaintiff(s),)
13)
14 vs.)
15)
16 SUSAN SERRANO, et al.)
17 Defendant(s),)
18)
19)

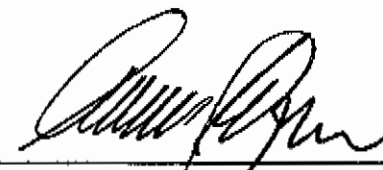
CASE NO. 5-03-375-EJG

NOTICE AND APPLICATION FOR
PERMISSION TO BE RELIEVED OF
THE ELECTRONIC FILING AND TO
FILE DOCUMENTS IN HARD COPY

Sentencing date: 2/03/06
Department: 8
Judge: Hon. Edward J. Garcia

20 TO the prosecution and all other interested parties:
21 Please take notice that by this Application, SUSAN
22 SERRANO will request to be relieved of the obligation for
23 electronic filing of documents. Said Application is filed
24 concurrently

25 DATED: January 4, 2006

26 
27 NORMAN L. SCHAFLER
28 Attorney for Defendant

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8 UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA

10
11 UNITED STATES OF AMERICA.,.) CASE NO. 5-03-375-EJG
12)
13 Plaintiff(s),)
14)
15 vs.) NOTICE AND APPLICATION FOR
16) PERMISSION TO BE RELIEVED OF
17 SUSAN SERRANO, et al.) THE ELECTRONIC FILING AND TO
18) FILE DOCUMENTS IN HARD COPY
19 Defendant(s),) Sentencing date: 2/03/06
20) Department: 8
21) Judge: Hon. Edward J. Garcia
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20 This matter was tried in Department 8 from November 14,
21 2005 through November 29 at which time the jury made their
22 findings.

23 Defense counsel not being on the internet and not being
24 internet savvy, made arrangements for electronic filing and
25 receipts of documents with a third party.

26 Shortly before Christmas of 2005, defense counsel was
27 made aware that the person handling the electronic filing
28 and receipt of documents was hospitalized for surgery and

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1 was operated upon shortly thereafter.

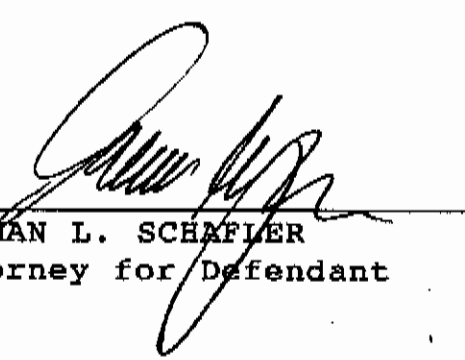
2 Defense counsel has been informed that person will not
3 be allowed back to work before the hearing date that is
4 presently set for judgment and sentencing, namely February
5 3, 2006.

6 Defense counsel had no other way of accessing the
7 electronic information or filing necessary documents in
8 this matter.

9 Defense counsel has prepared his objections to the
10 presentence report and is anticipating filing a Notice of
11 Appeal in this matter.

12 It is respectfully requested that Defense counsel be
13 allowed to file hard copies of the above documents.

14
15 DATED: January 4, 2006

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18 NORMAN L. SCHAFLER
19 Attorney for Defendant
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DECLARATION OF NORMAN L. SCHAFLE

I, NORMAN L. SCHAFLE, declare:

This matter was tried in Department 8 from November 14, 2005 through November 29 at which time the jury made their findings.

As this is the only case that I will be handling in the Eastern District and not being on the internet and not being internet savvy I made arrangements for electronic filing and receipts of documents with a third party.

Shortly before Christmas of 2005, I was made aware that the person handling the electronic filing and receipt of documents for me was hospitalized for surgery and was operated upon shortly thereafter.

I have been informed that person will not be allowed back to work before the hearing date that is presently set for judgment and sentencing, namely February 3, 2006 and perhaps not for two or three weeks thereafter.

I have no other way of accessing the electronic information or filing necessary documents in this matter or anyone else who can handle that for me.

I have prepared objections to the presentence report and intend to file a Notice of Appeal in this matter immediately after judgment and sentencing on February 3, 2006.

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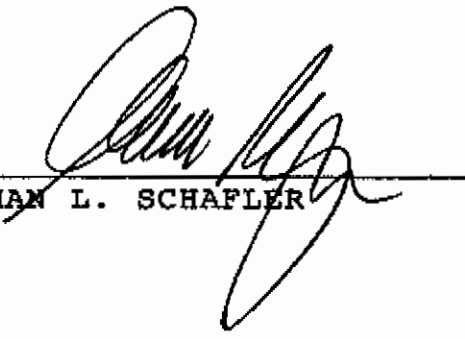
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1 I respectfully request permission to file hard copies
2 of the above documents.

3 I declare the foregoing to be true under penalty of
4 perjury.

5 Executed this 4th day of January 2006 at Terra Bella,
6 California.

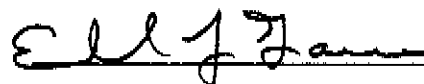
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10 NORMAN L. SCHAFLER
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ORDER

Good cause appearing therefore, defendant SUSAN SERRANO is relieved of the obligation of electronically filing and is allowed to file hard copies of documents.



Hon. Edward J. Garcia, Judge

1/5/06

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Schafler

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PROOF OF SERVICE
(C.C.P. Section 1013A(3))

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California.

I am over the age of eighteen and not a party to the within action; my business address is: 12304 Santa Monica Blvd., Suite 300, Los Angeles, California 90025.

On January 4, 2006, I served the following documents:

NOTICE AND APPLICATION FOR PERMISSION TO BE RELIEVED OF THE ELECTRONIC FILING AND TO FILE DOCUMENTS IN HARD COPY

on the interested parties in said action, by faxing a copy to 916-554-2900 placing a true copy thereof enclosed in a sealed envelope addressed as follows:

Daniel S. Linhardt
Assistant United States Attorney
501 "I" Street
Sacramento, Calif. 95814

 X I caused such envelope to be deposited in the mail at Terra Bella, California. The envelope was mailed with postage thereon fully prepaid.

Executed this 4th day of January, 2006, at Terra Bella, California

 X (State) I declare under penalty of perjury that the foregoing is true and correct.


NORMAN L. SCHAFLER